



ADVANCED CIRCUITRY

P. O. Box 2847, Commercial Station, Springfield, Mo. 65803 417 862-0751

Misty
Lynn
Karen/ab

June 17, 1982

Mr. John J. Franke
Regional Administrator
U.S. Environmental Protection Agency
Region VII
324 E. 11th
Kansas City, Missouri 64106

Dear Mr. Franke:

Please find enclosed our revised closure plan which was originally submitted on March 17, 1982 for closure of our surface impoundment in Springfield, Missouri.

If you have any questions, please do not hesitate to call.

Sincerely,

David L. Edwards

David L. Edwards
Facilities Manager

DLE/cm

Enclosure



R00337316
RCRA RECORDS CENTER

EPA-ARHM/HAZM

JUN 22 1982

Region VII K.C., MO

EPA HAZARDOUS WASTE STORAGE PERMIT
INTERIM REQUIREMENTS
Defined for Litton Advanced Circuitry Division
Storage Lagoons A & B
(Original 11/19/80, Rev 1 8/25/81,
Rev 2 3/82, Rev 3 4/15/82)

Subpart B - General Facility Standard

265.13 General Waste Analysis

- A. The following parameters of substances stored in "A" pond shall be tested for annually in December. The rationale for selection includes EPA requirements, DNR requirements, and a knowledge of our wastes produced:

<u>Sludge</u>	<u>Solution</u>
Chlorides	Cyanide
Iron	Copper
Manganese	Nickel
Phenols	Chromium
Sodium	Zinc
Sulfates	Lead
pH	Cadmium
Specific Conductance	Ammonia
Total Organic Carbon	Total Dissolved Solids
Total Organic Halogen	Total Suspended Solids
Chromium	Chlorides
Cyanide	Iron
Copper	Manganese
Nickel	Phenols
Zinc	Sodium
Solubility in Water	Sulfates
Specific Gravity	pH
Vapor Density	Specific Conductance
% By Weight of	Total Organic Carbon
Volatiles 100°C	Total Organic Halogen
% By Weight of	
Volatiles 600°C	
Boiling Point	

- B. All tests to be run in accordance with EPA Standard Methods by an independent outside lab or our internal laboratory.
- C. Sampling is done in accordance with ASTM Standards D346-75, D420-69, D1452-65, D2234-76, or EPA Standards 600/2-8-018, January 1980.

265.14 Security

- A. Physical contact or disturbance of waste does not constitute probable injury.
- B. Security measures do include the following:
1. 24 hour armed guards on premises

2. Total fenced enclosure
3. Controlled entry
4. Adequate signage

265.15 General Inspection Requirements

- A. The storage ponds shall be inspected daily and recorded as follows:
 1. Pond walls for erosion and leakage
 2. Pit pump and associated piping for operation and leakage
 3. Operation and recording of level indication
 4. Storage areas for rust, corrosion, cracks, leaks, missing or improper labels, and spills.
 5. Emergency equipment for operation
 6. Fence for damage
 7. Fugitive air emissions
- B. Inspections shall be recorded in a log with Date and Time, Person's Name Inspecting and Notation. All repairs are also to be recorded.

265.16 Personnel Training

- A. Personnel handling hazardous waste shall attend both classroom and OJT directed at their specific job functions.
- B. Hazardous waste handling personnel are defined as follows:
 1. Recycle Operators
 2. Plating Maintenance Persons
 3. Associate Engineer
 4. Plant Engineer
 5. Supervision of Above
- C. Instruction responsibility is given to the Facilities Manager.
- D. Contents of classroom instruction and OJT shall be comprised of:
 1. Missouri Hazardous Waste Rules & Regulations
 2. EPA Regulations
 3. Basic Hazardous Waste Chemistry & Handling
 4. Process Flow In and Out of Plant
 5. Safety
 6. Contingency Plan Implementation
 7. Emergency Responses
 8. Inspection Procedures
 9. How to Cut Off Waste Flow
 10. Communication Systems
 11. Fire Response
 12. Ground Water Contamination Response
 13. Operational Shutdown Plan
 14. Training Requirements
 15. Reporting Requirements
 16. Individual Responsibilities
- E. Classroom training shall take place annually and within 6 months for newly hired personnel.
- F. No untrained persons shall work unsupervised.

- G. Records are maintained in both facilities and personnel.
- H. Job descriptions and placement are available in personnel.
- I. Training records available in personnel and facilities.
- J. Records on terminated personnel to be kept for 3 years.

Subpart C - Preparedness & Prevention

- 265.31 Maintenance & Operation of Facility
 - A. The storage facility shall be maintained to minimize release of contents per other sections of the plan. Inspection criteria defined in 265.15.
- 265.32 Required Equipment
 - A. Telephone systems shall be maintained to allow immediate dissemination of information or notice of a release of hazardous material.
 - B. Equipment such as pumps and the tractor shall be maintained in operational condition to handle the possibility of release.
 - C. A secondary earthen dam is constructed to contain a primary release of material and allow time for implementation of the contingency plan.
- 265.33 Testing and Maintenance of Equipment
 - A. All equipment in 265.32 is in continual use and therefore constantly tested for operation.
- 265.34 Access to Communications or Alarm System
 - A. No direct handling of wastes exists except in sludge press room where a telephone system is operational.
- 265.37 Arrangements With Local Authorities
 - A. Copies of the contingency plan have been sent to local Police, Sheriff, Sanitary Services and DNR Offices.

Subpart D - Contingency Plan & Emergency Procedures

- 265.51 Purpose & Implementation of Contingency Plan
 - A. This contingency plan is defined in the following sections:
- 265.52 Content of Contingency Plan
 - A. The probable failures of the storage lagoons are as follows:
 - 1. Failure of pit pump
 - 2. Dike leaks
 - 3. Dike failure
 - B. In the case of any of the above, operators should:
 - 1. Notify the emergency coordinator
 - 2. Take immediate action to solicit help and contain the waste to a minimum area.
 - C. If the pit pump has failed, immediate replacement or repair is necessary. Spare parts and/or pump are

available in the maintenance department. Note: A secondary dam is constructed so pump failure constitutes no eminent danger.

- D. Dike leaks should be immediately closed off to prevent flow of waste. Note: Leaks from West wall do happen and are controlled by the pit pump. Of major concern are leaks from North, East, and South walls. The tractor shall be used to strengthen dikes to stop leakage. Any contaminated earth shall be removed and barrelled or run through the filter press for disposal.
- E. In case of dike failure, all wastes should be routed to the pit pump area or additional dams shall be built to provide a pumping station for pumps to pump waste to "C" pond for temporary storage. ("C" pond is a lined pond.)
- F. Primary Coordinator: James Dow, Director of
Technical Services
3317 S. Danbury
Springfield, Missouri 65807
work: 1-417-862-0751
home: 1-417-885-9785

Secondary: George Copeland,
Senior Plant Engineer
3654 S. Dayton
Springfield, Missouri 65807
work: 1-417-862-0751
home: 1-417-887-2675

- G. Equipment
 - 1. 1 John Deere 830 Tractor with front end loader
 - 2. 2 8h.p. 3" gasoline pump
 - 3. 1 20h.p. 4" gasoline pump
 - 4. Associated piping and hoses
 - 5. Telephone system
 - 6. Personal pocket pagers
 - 7. Internal paging
 - 8. Lime sand and chat on handAll equipment located with facility, capabilities obvious.

265.53 Copies of Contingency Plan

- A. Copies are maintained in:
 - 1. Facilities Manager's Office
 - 2. Plant Engineer's Office
 - 3. Recycle Operator's Manual
 - 4. Sent to those offices listed in 265.37 (A).

265.54 Amendment of Contingency Plan

- A. The plan shall be amended as follows:
 - 1. Regulations change
 - 2. The plan fails
 - 3. The facility changes
 - 4. Coordinators change

5. Equipment changes
- 265.55 Emergency Coordinator
1. The 24 hour emergency coordinators are as follows:

Primary - James Dow, Director of
Technical Services
3317 S. Danbury
Springfield, MO 65807
work: 1-417-862-0751
home: 1-417-883-9785

Secondary - George Copeland,
Senior Plant Engineer
3654 S. Dayton
Springfield, MO 65807
work: 1-417-862-0751
home: 1-417-887-2675

265.56 Emergency Procedures

- A. In case of emergency, the coordinator shall:
1. Take command
 2. Activate the contingency plan
 3. Notify appropriate personnel
 4. Evaluate the extent of the situation and assess appropriate detailed action
 5. Notify the National Response Center
1-800-424-8802 and indicate the following:
 - a. Name and telephone of reporter
 - b. Name and address of facility
 - c. Time and type of incident
 - d. Name and quantity of materials
 - e. Injuries
 - f. Possible hazards
 6. Take action to treat or store contaminated soil or surface waters.
 7. Emergency equipment is cleaned
 8. Notify Local, State, and the Regional Officials before operation is resumed.
 9. Submit a written report to the Regional Administrator including the following:
 - a. Name, address, and telephone number of operator
 - b. Name, address, and telephone number of facility
 - c. Date, time, and type of incident
 - d. Name and quantity of material involved
 - e. Extent of injuries
 - f. Assessment of actual or potential hazards
 - g. Estimated quantity and disposition of recovered material

Subpart E - Manifest System

265.73 Operating Record

- A. The hazardous waste storage site is the lagoon N.E. corner defined by 93° 22' 42" & 37° 14' 43"
- B. The following shall be recorded and maintained:
 - 1. All analysis of wastes shall be recorded
 - 2. Records of incidents
 - 3. Records and results of inspections
 - 4. Monitoring, testing, and analytical data

265.74 Availability, Retention, & Disposition of Records

- A. All records shall be made available upon request or for inspection by any officer, employee, or representative of the EPA.
- B. Upon closure, disposal locations and quantities shall be submitted to the Regional Administrator.

265.75 Annual Report Deleted by EPA

265.77 Additional Reports

- A. In addition to the Annual Report and unmanifested waste report, the following shall be submitted to the Regional Administrator:
 - 1. Releases, fires, and explosions
 - 2. Ground water contamination and monitoring data
 - 3. Facility closure

Subpart F - Groundwater Monitoring

265.90 Groundwater Monitoring Applicability

- A. Under review by state.

265.91 Groundwater Monitoring System

265.92 Sampling and Analysis

Subpart G - Closure and Post-Closure

265.111 Closure and Post-Closure

- A. Owner shall close facility in a manner to minimize all hazards.

265.112 Closure Plan

- A. In March, 1982, the city sewer system was available for hookup and Litton began its use for effluent discharge. At that time, Litton discontinued discharging effluent waters to A pond. Due to the DNR Eminent Hazardous Action of March, 1982, it is expected that the waste water in A pond may be removed by July 31, 1982. We will begin closure on approximately August 1, 1982.
- B. Based on calculations, approximately 1800 cubic yards of sludge will have accumulated and will be removed

to a hazardous waste site. A plan submitted by the contractor, O. H. Materials Company, has been submitted and is included in this report.

- C. Decontamination of equipment will include wash-down within the pond itself.
- D. Actual closure will start August 1, 1982, and will take approximately 2 months of excavation and loading time. Final closure will consist of grading over and seeding of the site.

265.113 Time Allowed for Closure

- A. Closure is to take place within 180 days of last receipt of wastes.
- B. We may apply to Regional Administrator for longer closure time.

265.114 Disposal or Decontamination of Equipment

- A. All the equipment and structures used in the closure shall be properly disposed of or decontaminated by high pressure water spray.

265.115 Certification of Closure

- A. Upon closure, Litton shall submit to the Regional Director certification thereof signed by the operator and an independent professional registered engineer.
- B. Expected certification date is August, 1982.

Subpart H - Financial Requirements

265.142 Cost Estimate for Facility Closure

- A. Litton has developed closure costs for facilities for \$465,000 per contract.

Subpart K - Surface Impoundments

265.222 General Operating Requirements

- A. Operation of lagoons shall be maintained 2 feet below runover.
- B. All dams, dikes, and walls shall have grass covering.
- C. Operating level shall be recorded daily.
- D. Dikes, walls, and vegetation shall be inspected for leaks, deterioration, or failure weekly.

265.228 Closure

- A. Litton shall remove:
 - 1. Standing liquids
 - 2. Waste and waste residue
 - 3. Underlying and surrounding contamination soil